

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:	Terrence A. Banks)	
	Terri Banks)	Case No. 11-32636-DOT
	Debtors.)	Chapter 13
)	
Address)	
	Terrence A. Banks)	
	Terri Banks)	
)	
	14537 Tealby Drive)	
)	
	Midlothian, VA 23112)	

Last four digits of SSN or ITIN: **9599**
5195

NOTICE OF MOTION TO EMPLOY SPECIAL COUNSEL

Jason M. Krumbein, Esq. has filed papers with this court seeking approval of employment of special counsel.

Your rights may be affected. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **21 DAYS FROM TODAY**, you or your attorney must:

File with the court and mail a copy to the Debtors' counsel, at the addresses shown below, a written request for a hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of the Court
U.S. Bankruptcy Court
701 E. Broad St., Suite 4000
Richmond, VA 23219

Jason M. Krumbein, Esq.
Krumbein Consumer Legal Services, Inc.
5310 Markel Road, Suite 102
Richmond, VA 23230

You must also attend a hearing to be scheduled at a later date.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

Date: May 29, 2013

/s/ Jason M. Krumbein, Esq.

5310 Markel Road, Suite 102

Richmond, VA 23230

VSBN 43538

Counsel for Debtor in Bankruptcy

CERTIFICATE OF SERVICE

See certification in Application Attached hereto

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:	Terrence A. Banks)	
	Terri Banks)	
	Debtor.)	Case No. 11-32636-DOT
)	Chapter 13
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	14537 Tealby Drive)	
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	Midlothian, VA 23112)	

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MOTION TO EMPLOY SPECIAL COUNSEL

COMES NOW, Krumbein Consumer Legal Services, Inc., counsel for Debtor(s), and pursuant to 11 USC 330 says as follows:

- 1) This motion is filed pursuant to 11 USC 30.

JURISDICTION, VENUE, CORE PROCEEDING

- 2) This court has jurisdiction pursuant to 28 USC 1441.
- 3) This is the proper venue pursuant 28 USC 1391.
- 4) This is a core proceeding pursuant to 28 USC 157.

PARTIES

- 5) The movants are the Debtors in the above identified case, as defined by the Bankruptcy Code.
- 6) Respondents are creditors as defined by the Bankruptcy code.

FACTS

- 7) Movants filed a Voluntary Petition for Relief in this court on 04/19/2011.

- 8) Movant wishes to employ special counsel to prosecute a complaint to determine validity, priority and extent of a lien on real property.
- 9) Counsel has agreed to represent movant if the court approves this employment.
- 10) Counsel is to be paid through the Chapter 13 Plan, upon approval by the court of a Supplemental fee application to be submitted at the completion of the action anticipated by this motion.
- 11) Movant will pay \$500 directly to special counsel upon approval, to be held in escrow to be applied against costs incurred in the prosecution of the action.

RELIEF REQUESTED

Movants request that the court approve the foregoing motion for the reasons stated above.

/s/ Jason M. Krumbein, Esq.
Jason M. Krumbein, Esq. VSBN 43538
Counsel for the Debtor(s) in Bankruptcy
Krumbein Consumer Legal Services, Inc.
5310 Markel Road, Suite 102
Richmond, VA 23230
Tel: 804.303.0204 Fax: 804.303.0209
jkrumbein@krumbeinlaw.com

CERTIFICATE OF SERVICE

I certify that I have this May 29, 2013, transmitted a true copy of the foregoing application electronically through the court's CM/ECF system to the Chapter 13 Trustee and US Trustee, and by regular mail to the to the Debtor and all creditors listed on the attached Service List.

/s/ Jason M. Krumbein, Esq.
Counsel for the Debtor(s) in Bankruptcy

PNC Mortgage, a division of PNC Bank, N.A. 3232 Newmark Drive Miamisburg, OH 45342	JP Morgan Chase 3415 Vision Dr. OH 4-7142 Columbus, OH 43219	PRA Rec. Mgmt, LLC., as agent for Portfolio Recovery Associates, LLC POB 41067 NORFOLK, VA 23541
Sallie Mae Inc. on behalf of USAF Attn: Bankruptcy Litigation Unit E3149 P.O. Box 9430 Wilkes-Barre, PA 18773-9430	FIA Card Services, NA as successor in interest to Bank of America NA and MBNA America Bank PO Box 15102 Wilmington, DE 19886-5102	eCAST Settlement Corporation POB 29262 New York, NY 10087-9262
Midland Funding LLC by American InfoSource LP as agent PO Box 4457 Houston, TX 77210-4457	Five Lakes Agency, Inc. J. P. Morgan Chase Bank, NA P.O. Box 80730 Rochester, MI 48308	Terrence Banks Terri Banks 14537 Tealby Dr Midlothian, VA 23112
Pia J. North North & Assoc. (BY ECF)		